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8 **UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA**

10 SECURITIES AND EXCHANGE 20-CV-00511
11 COMMISSION, GOVERNMENT'S UNOPPOSED MOTION
12 Plaintiff, TO INTERVENE AND TO STAY
13 v. PROCEEDINGS
14 BRADLEY C. REIFLER, *et al.*,
15 Defendants.

17 The United States of America (the “Government”), pursuant to Federal Rule of Civil
18 Procedure 24, hereby moves the Court for an order:

19 (1) permitting the Government to intervene in the above-captioned civil action;
20 (2) staying the above-captioned civil action, with such stay being in effect until the
21 resolution of the criminal case against Defendant Bradley C. Reifler. *See United States. v*
22 *Reifler*, 20-cr-00512, M.D.N.C.

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1 The accompanying Memorandum of Points and Authorities is incorporated into this
2 Motion as if fully set forth herein.
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4 Date: February 10, 2021

Respectfully submitted,

5 DANIEL KAHN
6 Acting Chief
7 Criminal Division, Fraud Section

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9 /s/ *Thomas J. Tynan*
10 Thomas J. Tynan
11 Trial Attorney
12 Criminal Division, Fraud Section
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CERTIFICATE OF SERVICE

I hereby certify, this 10th day of February, 2021, that I caused the foregoing Government's Unopposed Motion to Intervene and Stay Proceedings, the accompanying Memorandum of Points and Authorities in Support, and the proposed order to be electronically filed with the Clerk of Court using the ECF system, which will send notification of such filing to counsel for the parties.

/s/ Thomas J. Tynan

Thomas J. Tynan
Trial Attorney